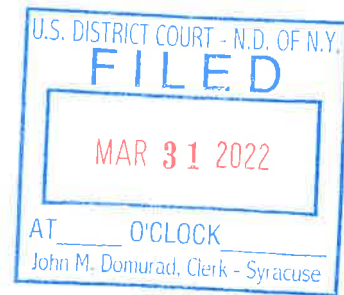


United States District Court
Northern District of New York

Andrew J. Schaff,)
)
Plaintiff(s))
vs.)
)
Brighton Towers Resident's Association;)
Cindy Curtis, President;)
Dennis Hough, Vice President;)
Sharon Miller, Treasurer;)
Penny Mutter, Bldg Rep;)
Sharron Redmond, Vice President;)
Defendant(s))

Civil Case No.: 5:22-CV-302 (TJM/ATB)

**Civil Rights Complaint
Pursuant To
42 USC § 2000d**



Plaintiff demands a trial by the Court.

Plaintiff in the above-captioned action, alleges as follows:

JURISDICTION

1. This is a civil action seeking relief and /or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 USC 2000d. The Court has jurisdiction over this action pursuant to 28 USC 1331, 1343(3) and (4) and 2201.

PARTIES

2. a. Plaintiff: Andrew Schaff
Address: 833 E Brighton Avenue, Apartment 1714, Syracuse, NY 13205
3. a. Defendant: Cindy Curtis
Official Position: President (3/22) of Brighton Towers Resident's Association
Address: 821 E Brighton Avenue, Apt 1410, Syracuse, NY 13205

b. Defendant: Dennis Hough

Official Position: Secretary (2/22) of Brighton Towers Resident's Association

Address: 821 E Brighton Avenue, Apt 1404, Syracuse, NY 13205

c. Defendant: Sharron Miller

Official Position: Treasurer (3/22) of Brighton Towers Resident's Association

Address: 833 E Brighton Avenue, Apt 1710, Syracuse, NY 13205

d. Defendant: Penny Mutter

Official Position: Building Rep 1 (3/22) of Brighton Towers Resident's Association

Address: 821 E Brighton Avenue, Apt 704, Syracuse, NY 13205

e. Defendant: Sharron Redmond

Official Position: Vice President (3/22) of Brighton Towers Resident's Association

Address: 833 E Brighton Avenue, Apt 1210, Syracuse, NY 13205

FACTS

4. a. **The Defendants**– Brighton Towers Residents Association has not acted as a legitimate Tenant Association under The Federal Code of Tenant Associations, and fraudulently misrepresents its Members as such.

The Association does not work together with any attempt to improve the quality of life for its Members in dealing with management regarding harassment, repairs or complaints. [1]

When Members approach the Association with a problem, they are redirected to management, as the Association only promotes activities and entertainment for the residents. [2]

- b. **September 2021**– Plaintiff spoke out and asked questions of the Association at the September 2021 Members meeting.

Dennis Hough, Vice President, stated the Association was sponsored by HUD and was not required to register and exempt from all laws.

Then the Board of Officers sent a memo to Syracuse Management in violation of Plaintiff rights, and in violation of federal laws. [3]

- c. **February 2022**– Prior to, during and after the February 2022 Member meeting, the Plaintiff was appointed to office of Vice President by the President, Cindy Curtis;

Sharron Redmond, Building Representative II, created a commotion with Dennis Hough, Secretary, over a matter with bedbugs.

In the absence of an Executive Board of Directors, Sharron Redmond, in violation of The Federal Code of Tenant Associations, then complained to management, seeking the removal of, Dennis Hough, from holding office. [4]

Then after a meeting of the Officers serving as the Executive Board of Directors, it was voted upon to dismiss, Sharron Redmond, as Building Representative II.

Penny Mutter, Building Representative I, did not agree with the dismissal, and complained to the management in violation of Federal Code. [5] Penny complained that if the Plaintiff was not voted in as Vice President, then the Letter of Dismissal would be null and void, as the Plaintiff, signed the letter.

Syracuse Management demanded a meeting in violation of Federal Code in which, Lisa Barletta, representing Syracuse Management and Rochester Management in regards to fair housing and states that the dismissal letter violates fair housing laws and would be null and void. [6] [7]

Lisa, furthermore added that the Plaintiff was not legally appointed to the position of Vice President, and instructed Cindy Curtis, President, to remove the Plaintiff from office. [8]

- d. **March 2022**- A letter of intention was mailed to the Association President, Cindy Curtis, as a courtesy, to see if there was an opportunity to resolve violations involving the Plaintiff, and his rights under State and Federal Laws.
- Rather than the Association respond to a letter addressed and delivered to the Association, Cindy turned to management which only added to the violations of Federal Code. [9]
- Syracuse Management on behalf of Rochester Management responded, seeking a meeting regarding the Letter of Intentions, and in violation of Federal Codes. [10]
- The Plaintiff, as stated in the Letter of Intention, Filed a Complaint / Appeal with HUD regarding the ruling that the dismissal letter and appointment as Vice President were violations of Fair Housing. A review by HUD on 3/22/22 was that bedbugs was not a protected class, the meeting in its self was a violation of the Plaintiff rights under housing, and any ruling would violate Federal Code.
- e. **The Plaintiff** has made at least three attempts to resolve issues with the dysfunctional association, and each time the association has failed to respond to the Plaintiff; and responds to management instead. [11]

CAUSES OF ACTION

5. a. Overall and specifically to the Plaintiff being dismissed from the Office of Vice President, that the Plaintiff was discriminated against under Section 109 of Housing and Community Development Act of 1974 (based on sex) when Sharron Redmond was appointed to fill the vacancy of Vice President, using the same method that was previously ruled illegal.
- b. The remaining causes of actions [1] through [11] fall under the Plaintiff rights under 24 CFR §245.100 – 245.110 in which the Association has involved management to resolve the

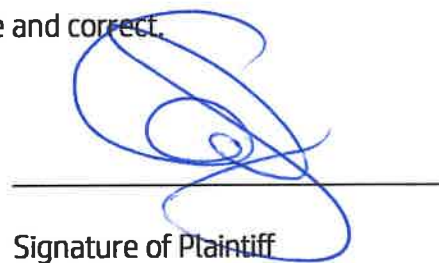
Associations business in absence of having an actual Executive Board of Directors as stipulated in its By-Laws.

PRAYER FOR RELIEF

6. a. The Association should be forced to comply with its By-Laws and establish an Executive Board of Directors.
- b. The Association should be forced to comply with the Federal Code of Tenant Associations.
- c. The Association should stop involving management into the Associations business, as they are required to be independent of each other under Federal Laws.
- d. In the event that the Association can not or will not comply with both state and federal laws, the Association should be dissolved under judicial order.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2022



Signature of Plaintiff

Sworn to before me this 31st day of March. 2022

Notary Public